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11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 TEAL PETALS ST TRUST,

14 Plaintiff,

15 vs.

16 NEWREZ LLC f/k/a NEW PENN FINANCIAL
17 dba SHELLPOINT MORTGAGE SERVICING;
18 a foreign limited liability company; and DOE
19 individuals I through XX; and ROE
CORPORATIONS I through XX,

20 Defendants.

21 NEWREZ LLC f/k/a NEW PENN FINANCIAL
22 dba SHELLPOINT MORTGAGE SERVICING,

23 Counterclaimant,

24 vs.

25 TEAL PETALS ST TRUST; DOES I through X,
26 inclusive; and ROE CORPORATIONS
I through X, inclusive,

27 Counterdefendants.
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Case No.: 2:22-cv-00395-JAD-DJA

Consolidated with

Case No.: 2:23-cv-01839-JAD-MDC

**STIPULATION AND ORDER TO
EXTEND BRIEFING SCHEDULE**

(SECOND REQUEST)

NEWREZ LLC f/k/a NEW PENN FINANCIAL
dba SHELLPOINT MORTGAGE SERVICING,

Plaintiff,

vs.

IYAD HADDAD aka EDDIE HADDAD;
RESOURCES GROUP, LLC; RESOURCES
GROUP LLC as Trustee of TEAL PETALS ST
TRUST; 9863 DUBLIN VALLEY, LLC;
SATICOY BAY LLC d/b/a SATICOY BAY
LLC SERIES 9863 DUBLIN VALLEY ST;
SATICOY BAY LLC SERIES 9863 DUBLIN
VALLEY ST; DOES I through X and ROE
BUSINESS ENTITIES I through X, inclusive,

Defendants.

NewRez LLC f/k/a New Penn Financial d/b/a Shellpoint Mortgage Servicing (**Shellpoint**) and Resources Group, LLC; Resources Group, LLC as Trustee of Teal Petals St Trust; 9863 Dublin Valley, LLC; Saticoy Bay, LLC d/b/a Saticoy Bay LLC 9863 Dublin Valley St.; Saticoy Bay LLC 9863 Dublin Valley St.; and Iyad Haddad aka Eddie Haddad (collectively, **Defending Parties**) stipulate as follows:

1. On September 3, 2024, three of the Defending Parties (Resources Group, LLC; Resources Group, LLC as Trustee of Teal Petals St Trust; 9863 Dublin Valley, LLC) filed three discovery motions: a motion for protective order, ECF No. 71; a motion to stay or bifurcate discovery, ECF No. 72; and a motion to extend time to respond to Shellpoint's interrogatories and requests for admissions, ECF No. 73. The other three Defending Parties (Saticoy Bay, LLC d/b/a Saticoy Bay LLC 9863 Dublin Valley St.; Saticoy Bay LLC 9863 Dublin Valley St.; and Iyad Haddad aka Eddie Haddad) joined them. ECF Nos. 74-76.

2. The discovery motions referenced above are set for hearing on November 25, 2024.

3. The parties previously stipulated Shellpoint shall have until October 2, 2024, to respond the pending discovery motions and the joinders thereto, and the Defending Parties shall have until October 25, 2024, to reply in support and respond to any countermotion Shellpoint may file. The parties further stipulated Shellpoint shall have until November 15, 2024, to reply in support of any countermotion(s) it may file. ECF No. 78.

1 4. This court approved the parties stipulations and extended the briefing schedule
2 accordingly. ECF No. 79.

3 5. Counsel for the parties subsequently met and conferred regarding the Defending
4 Parties' responses to Shellpoint's first set of requests for production on September 25, 26, and 27.
5 During these discussions, Defending Parties' counsel expressed their clients may be willing to
6 supplement their responses and/or produce responsive documents or additional responsive documents
7 in some instances. The requested discovery encompasses multiple parties that are represented by two
8 different law firms. It has proven difficult for the Defendants and their counsel to coordinate a date
9 and time to review the matters. In addition, Christopher Benner, Esq., who previously primarily
10 handled the day-to-day defense of this case for Roger P. Croteau & Associates, Ltd., recently made a
11 transition into personal injury law. As a result, the undersigned Timothy Rhoda, Esq., has been
12 required to familiarize himself with the case. Counsel for the Defending Parties intend to confirm
13 with their respective clients and inform Shellpoint's counsel as to the Defending Parties' positions by
14 October 7, 2024.

15 6. In light of the foregoing, Shellpoint and the Defending Parties agree Shellpoint may
16 have until **October 14, 2024** to respond the pending discovery motions and the joinders thereto, ECF
17 Nos. 71-76.

18 7. The Defending Parties shall have until October 25, 2024, to reply in support and
19 respond to any countermotion Shellpoint may file, and Shellpoint shall have until November 15, 2024,
20 to reply in support of any countermotion(s) it may file.

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8. The parties further agree the pending discovery motions shall remain set for hearing on November 25, 2024, and that the hearing shall include any countermotion filed consistent with the paragraphs above.

9. This is the parties' second request for an extension of this briefing schedule and is not intended to cause any delay or prejudice to any party.

DATED this 30th day of September, 2024.

AKERMAN LLP <u>/s/ Paige L. Magaster</u> ARIEL STERN, ESQ. Nevada Bar No. 8276 NATALIE L. WINSLOW, ESQ. Nevada Bar No. 12125 PAIGE L. MAGASTER, ESQ. Nevada Bar No. 15557 1635 Village Center Circle, Suite 200 Las Vegas, NV 89134 <i>Attorneys for NewRez LLC f/k/a New Penn Financial d/b/a Shellpoint Mortgage Servicing</i>	ROGER P. CROTEAU & ASSOCIATES, LTD <u>/s/ Timothy E. Rhoda</u> ROGER P. CROTEAU, ESQ. Nevada Bar No. 4958 TIMOTHY E. RHODA, ESQ. Nevada Bar No. 7878 2810 W. Charleston Boulevard, Suite 67 Las Vegas, NV 89102 <i>Attorneys for Defendants Resources Group, LLC; Resources Group, LLC as Trustee of Teal Petals St Trust; and 9863 Dublin Valley, LLC</i>
LAW OFFICES OF MICHAEL F. BOHN, ESQ. LTD. <u>/s/ Michael F. Bohn</u> MICHAEL F. BOHN, ESQ. Nevada Bar No. 1641 2260 Corporate Circle, Suite 480 Henderson, NV 89074 <i>Attorney for Defendants Saticoy Bay LLC; Saticoy Bay LLC 9863 Dublin Valley St. and Iyad Haddad</i>	

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATED: __10/1/2024__